EXHIBIT 141

UPS SCS Suspicious Order Monitoring Program Summary

PURPOSE:

The purpose of this document is to describe, at a high level, the UPS Supply Chain Solutions (UPS SCS) Suspicious Order Monitoring (SOM) program, its components and processes.

DISCLAIMER:

Due the amount of intellectual capital that UPS SCS has invested in its SOM program, copies of certain SOM program documents are not available for distribution outside of UPS SCS, but are available on site for review. Other SOM program documents on the specifics of the SOM tool and algorithm it uses are not available for distribution outside of UPS SCS, nor are they available for review on site because of the proprietary nature of the content of those documents. Regulatory Affairs controls the distribution of all SOM procedures and documents and their distribution.

SCOPE:

UPS SCS, as a Third Party Logistics provider, distributes Controlled Substances and List I Chemicals to its clients' customers. Because UPS SCS does not hold the relationship directly with the registrants for outbound shipments, it is often not possible for UPS SCS to specifically "know our customers" as recommended by the Drug Enforcement Administration (DEA) with regard to SOM. Because of these challenges and UPS SCSs lack of direct contact with our clients' customers, UPS SCS is unable to directly profile the entities to whom Controlled Substances and List I Chemicals are shipped, by conducting routine customer questionnaires, on-site visits, having letters of agreement of product use for legitimate medicinal purposes, etc. UPS SCS has, however, developed a robust SOM process and tool for evaluating all orders of Controlled Substances and List I Chemicals that will ship from any UPS SCS DEA- registered facility.

The SOM tool that UPS SCS has developed assesses ordering patterns of clients' customers over time and compares orders with the ordering patterns of other customers who order that product. The SOM tool is used in conjunction with the UPS SCS, in-house, proprietary Logistics Management System (LMS) in the United States. All products requiring SOM processing (i.e., Schedule II-V Controlled Substances and List I Chemicals) will have the "excessive order flag" functionality set "on" in the LMS system. Discussions by Regulatory Affairs (RA) with the client, Operations, and Quality Assurance (QA) take place to establish contact lists, and order cut-off times are established. A client/product-specific plan is developed and discussed with the client before the product is flagged for SOM evaluation, because all orders containing flagged product go on SOM hold until they are run through the assessment tool and are released (or terminated).

THE SOM TOOL:

UPS has in-house PhD statisticians who developed a sophisticated algorithm with a user-friendly dashboard that, in conjunction with its trained user, imports and utilizes historical LMS order data for a particular customer (DEAID). Orders are evaluated based on the DEA drug code, not the part number

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or NDC number. The SOM tool evaluates each new flagged order for that DEAID based on the following four main criteria:

- Order size (quantity)
- Order frequency
- Customer types compared to similar customer type (e.g., wholesaler, retail pharmacy, clinic, etc.)
- Customer type compared to all customer types

The check for each of the four criteria will return a green, yellow, or red result.

- Green = Good, no issues
- Yellow = Caution, too few data points
- Red = Stop, order has possible issues

Green orders will be released for immediate distribution. Red orders will be identified as Orders of Interest (OoI) and will be evaluated per an established evaluation process. Yellow orders may be identified as an OoI at the discretion of the Regulatory Affairs Department.

When an OoI is identified and held for SOM OoI evaluation, RA notifies the on-site QA Representative and the on-site Operations Representative. The Operations Representative for the client account with the OoI is responsible to ensure that adequate staffing is maintained for large or multiple pended orders and for orders that may be released after the already established client order cut-off time. Every effort is made to expediently resolve any questions and release the order, if appropriate.

An internal evaluation is conducted to see if there is a justifiable reason the order is not suspicious. If deemed non-suspicious, the order is released from hold by RA. Release is approved by RA management and documented including the justification/rationale. If no justifiable reason is found to release the order, an external evaluation, which includes contact with the client, who in turn will contact their customer, is conducted. If deemed non-suspicious after external evaluation, the order is released from hold by RA. Release is approved by RA management and documented including the justification/rationale.

Any OoI that cannot be justified after a thorough internal and/or external investigation will be considered a suspicious order and will be cancelled/terminated in the system by RA. Order information for all orders that will be cancelled or terminated will be communicated to the client, the on-site QA Representative, and the on-site Operations Representative.

UPS SCS RA Management reserves the right to cancel/terminate any order deemed suspicious and report the order to the DEA and/or state agencies, as required.